

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

**S.H., individually, and on behalf  
of all others similarly situated,**

**Plaintiff,**

**v.**

**No: 2:23-cv-00071-TRM-JEM**

**CITY OF JOHNSON CITY, TENNESSEE,**

**Defendant.**

\_\_\_\_\_/

**MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Minor Victim 1, by and through undersigned counsel and through his parents and legal guardians A.A. and H.H., request permission to file certain documents under seal pursuant to L.R. 26.2 and this Court's Order. Minor Victim 1 seeks to file the following documents under seal:

(1) The Declarations of Vanessa Baehr-Jones, Heather Collins, Elizabeth Kramer, H.H., and A.A.;

(2) The Attachment to Petition and/or Order for Minor's Compromise (Exh. 1 to the Declaration of Vanessa Baehr-Jones);

(3) The Confidential Settlement Agreement between Minor Victim 1 and Defendants (Exh. 1 to the Declaration of H.H.);

(4) The Redacted Attorney Client Agreement between counsel and Minor Victim 1 (Exh. 2 to the Declaration of H.H.); and

(5) The Illustration of the Structured Settlement Annuity Contract (Exhibit 3 to the Declaration of H.H.).

Additionally, Minor Victim 1 requests that the Court permit Exhibit 2 to the Declaration of H.H. be filed under seal in a redacted form given that this document represents the confidential and privileged attorney client contract between Minor Victim 1's guardian and undersigned counsel. This document is provided for the limited purpose of judicial review of the Minor's Settlement. It is appropriate that an otherwise attorney-client privileged document remain confidential and be filed under seal and in a redacted form.

While there is a strong presumption that court files will be open to the public, this presumption may be overcome when an individual's interest in privacy outweighs the public interest in the disclosure. *Smith v. S.E.C.*, 129 F.3d 356, 358 n.1 (6th Cir. 1987). Local Rule 26.2 permits the Court to place documents under seal for good cause shown. This Court has previously found it is in the best interest of minors in a minor settlement to keep their financial information confidential and not publicly known, specifically the amount contained in a settlement agreement. *Wood v. Cindy Van Over*, No. 3:18-CV-380-TRM-DCP, Doc. 106 (E.D. Tenn. Nov. 15, 2019). Minor Victim 1 seeks to file settlement documentation as exhibits in support of Minor Victim 1's Petition to Approve Minor Settlement. The parties have agreed to maintain the terms of this settlement contained in the settlement documentation as confidential as part of their settlement agreement. Confidentiality of the terms and specifics of the settlement agreement in this case is in the best interest of Minor Victim 1, as well as is the continued protection of Minor Victim 1's identity.

//

//

Minor Victim 1 therefore respectfully request that confidentiality of these records be maintained, and the Court permits the above documents to be filed under seal.

Respectfully submitted,

HMC Civil Rights Law, PLLC

s/ Heather Moore Collins

Heather Moore Collins (# 026099)

Caroline Drinnon (#037016)

Ashley Shoemaker Walter (#037651)

7000 Executive Center Dr., Suite 320

Brentwood, TN 37027

615-724-1996

615-691-7019 FAX

heather@hmccivilrights.com

caroline@hmccivilrights.com

ashley@hmccivilrights.com

Advocates for Survivors of Abuse PC

/s Vanessa Baehr-Jones

Vanessa Baehr-Jones CABN # 281715

*Pro Hac Vice*

**Advocates for Survivors of Abuse PC**

4200 Park Boulevard No. 413

Oakland, CA 94602

(510) 500-9634

vanessa@advocatesforsurvivors.com

s/ Elizabeth Kramer

Julie Erickson (California Bar # 293111)

Elizabeth Kramer (California Bar # 293129)

Kevin Osborne (California Bar #261367)

*Pro Hac Vice*

Erickson Kramer Osborne LLP

959 Natoma St.

San Francisco, CA 94103

415-635-0631

julie@eko.law

elizabeth@eko.law

kevin@eko.law

Attorneys for Plaintiffs and Proposed Class

**CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on July 25, 2025, to counsel of record:

K. Erickson Herrin  
HERRIN, McPEAK & ASSOCIATES  
515 East Unaka Avenue  
P. O. Box 629  
Johnson City, TN 37605-0629  
rachel@hbm-lawfirm.com

Emily C. Taylor  
Maria Ashburn  
WATSON, ROACH, BATSON &  
LAUDERBACK, P.L.C.  
P.O. Box 131  
Knoxville, TN 37901-0131  
etaylor@watsonroach.com  
mashburn@watsonroach.com

Jonathan P. Lakey  
Burch, Porter, & Johnson, PLLC  
130 N. Court Ave.  
Memphis, TN 38103  
901-524-5000  
jlakey@bpjlaw.com  
mchrisman@bpjlaw.com

*Attorneys to Defendant City of Johnson City,  
Tennessee*

/s/ Elizabeth A. Kramer  
Elizabeth A. Kramer